

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)	
YESICA PAOLA. DELVALLE,)	
)	
DEBTOR.)	CASE NO.: 24-12464-amc
)	CHAPTER 13
)	JUDGE ASHELY M. CHAN
MCLP ASSET COMPANY, INC.,)	
AS SERVICED BY NEWREZ LLC D/B/A)	
SHELLPOINT MORTGAGE SERVICING,)	
)	
CREDITOR.)	
)	
YESICA PAOLA DELVALLE, DEBTOR)	
AND SCOTT F. WATERMAN,)	
)	
RESPONDENTS.)	

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, MCLP Asset Company, Inc. as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing, (“Secured Creditor”) by and through its undersigned attorneys, and for its Objection to Confirmation of Debtors Chapter 13 Plan, herein states and alleges as follows:

1. This Court has exclusive jurisdiction over this proceeding. Debtor filed this Petition under Chapter 13 of the United States Bankruptcy Code on or about July 17, 2024 and confirmation is pending with the Court.
2. Secured Creditor holds a lien over Debtor’s property described as 2114 East Clearfield Avenue, Philadelphia, PA 19134.
3. As of the date of filing this Objection to Confirmation, Secured Creditor’s estimated secured claim is \$34,636.45 and the underlying loan matures on December 1, 2036. Secured Creditor will file its Proof of Claim by the bar date of September 25, 2024, with the approximate arrears of \$22,271.39, which is above the arrearage of \$19,580.30 listed on Debtor’s Plan.
3. Therefore, the plan fails 11 U.S.C. §1322 (b)(2)-(3), and pursuant to 11 U.S.C. §1325 (a)(5) the plan cannot be confirmed.

WHEREFORE, MCLP Asset Company, Inc. as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing, prays that its Objection to Confirmation of Plan be sustained, and for all further relief as is just and proper.

Respectfully submitted,

/s/ Joshua I. Goldman
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Counsel for Creditor

CERTIFICATE OF SERVICE

I hereby certify that on or before August 27, 2024, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected below.

VIA U.S. MAIL

DEBTOR
YESICA PAOLA. DELVALLE
2114 E. CLEARFIELD STREET
PHILADELPHIA, PA 19134

VIA ELECTRONIC NOTICE

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